

April 23, 2021

VIA ECF

Honorable Carol B. Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Schonberg et al. v. Strulovich et al. - Case No. 17-cv-2161

Dear Judge Amon:

The Plaintiffs represented by Bronstein, Gewirtz & Grossman LLC (“BGG Firm”)¹ and Defendants represented by Herrick, Feinstein, LLP (“Defendants”) jointly write to update the Court on the status of their efforts to negotiate an agreement that would govern a global arbitration.

We have and continue to make significant progress on the negotiation of the global arbitration agreement, which has been a complicated undertaking in light of the number of claimants, respondents, actions (which include bankruptcy matters), and lawyers involved. The parties are in the process of finalizing the terms, and then will need to obtain the signatures of the many individuals (most of whom reside overseas) and entities that will be participating.

Accordingly, we request that that the Court adjourn the forthcoming status conference from April 30, 2021 to June 11, 2021, with the parties to update the Court by letter by June 4, 2021 (1) on the status of their efforts to negotiate an arbitration agreement; (2) whether the Strulovich Defendants still seek leave to file a motion to stay the instant action; and (3) whether the Plaintiffs still seek leave to renew their motion to amend the complaint.

Respectfully submitted,

/s/ Ezi Soloveichik

/s/ Scott C. Ross

Ezi Soloveichik
Counsel for Plaintiffs

Scott C. Ross
*Counsel for
Strulovich Defendants*

¹ The BGG Firm represents all of the plaintiffs in this action except five: Shimon Asulin, Clara Grossman, Irving Grossman, David Schonfeld, and Pnina Schonfeld.